## UNITED STATES BANKRUPTCY COURT EATERN DISTRICT OF PENNSYLVNIA

IN RE: : CHAPTER 13

:

RAYMOND D. MCCRAY

:

Debtor : BANKRUPTCY NO. 17-16101

:

Us Bank, NA : Movant :

## DEBTOR'S ANSWER TO MOTION FOR RELIEF FROM THE AUTOMATIC STAY FILED BY US BANK, NA FOR PA HOUSING FINANCE AGENCY

NOW COMES RYAMOND D. MCCRAY, SR., by and through his attorney, Ashley M. Sullivan, Esquire, and hereby files an answer to the Motion for Relief from the Automatic Stay.

- 1. Admitted.
- 2. Admitted.
- 3. Admitted.
- 4. Admitted.
- 5. Admitted.
- 6. Denied. Debtor has sufficient funds to cure any present delinquency.
- 7. Denied. The averments in Paragraph 7 are denied and strict proof is demanded.
- 8. Denied. The averments in Paragraph 8 are denied and strict proof is demanded.
- 9. Denied.
- 10. Denied.
- 11. Denied.

WHEREFORE, Respondent respectfully requests that Movant's Motion to Relief from the Automatic Stay be denied.

FREEDMAN AND LORRY, P.C.

BY: /s/ Ashley M. Sullivan

ASHLEY M. SULLIVAN, ESQUIRE

Attorney for Debtor

## **CERTIFICATION**

Petitioner certifies under penalty of perjury that the matters stated herein are true and correct to the best of her knowledge, information, and belief.

DATE: August 27, 2018

ATTORNEYS FOR DEBTOR

/s/ Ashley M. Sullivan ASHLEY M. SULLIVAN, ESQUIRE FREEDMAN AND LORRY, P.C. 1601 Market Street, Ste. 1500 Philadelphia, PA 19103 (215)925-8400